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January 10, 2018

Chambers of The Hon. Leonard D. Wexler

RE: Case Number: 2:17-cv-00512

Dear Chambers:

I am counsel for the Plaintiff Valley National Bank. Upon our filing of a motion for a default judgment, and a conference call with this Court, the parties reached an agreement that a new deed would be executed to Claudia Ottimo. That was not done.

That was my status update to the Court on October 20th, 2017.

Counsel for Claudia Ottimo, Steven Legum, has not advised the status of the deed transfer despite several requests by phone and email that I made to his office. Counsel Steven Legum's last email to me on the 10th of January indicated he would request to be relieved as counsel.

My last appearance in Court was July 17th, 2017 in support of the Plaintiff's order to show cause was unopposed. Plaintiff's subsequent notice of motion for a default judgment was unopposed. In light of Steven Legum's inability to provide a status and the Defendant's non-compliance with our agreement, Plaintiff has no alternative but to request permission to proceed with entry of its default judgment.

Sincerely,

/s/ John Manfredi

John Manfredi

CC: Steven Legum (via email)